

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

_____)	
AMPEX CORPORATION,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	
)	C.A. No. 04-1373 (KAJ)
EASTMAN KODAK COMPANY,)	
ALTEK CORPORATION, and)	
CHINON INDUSTRIES, INC.,)	
)	
<i>Defendants.</i>)	
_____)	

**NOTICE OF DEPOSITION OF
DEFENDANT EASTMAN KODAK COMPANY**

TO: All Parties and their Attorneys of Record:

PLEASE TAKE NOTICE: Pursuant to Federal Rule of Civil Procedure 30(b)(6), Ampex will take the deposition of Defendant Eastman Kodak Company ("Kodak"), commencing on January 17, 2006, at 9:00 a.m., at the American Consulate General Osaka-Kobe, 11-5 Nishitenma 2-Chome, Kita-Ku, Osaka, Japan, 530-8543, or at such other time and place agreed upon by the counsel to the parties.

Kodak shall designate one or more of its officers, directors or managing agents, or other persons with knowledge of the matters set forth in Schedule A of this notice to appear and testify on its behalf at the deposition. The persons so designated shall testify as to matters known or reasonably available to Kodak.

This examination will be taken before a Notary Public or other person authorized to administer oaths and will be recorded stenographically and/or by video and shall continue from day to day until completed.

You are invited to attend.

MORRIS, NICHOLS, ARSHT & TUNNELL

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December 19, 2005

SCHEDULE A

INSTRUCTIONS AND DEFINITIONS

Ampex incorporates by reference the instructions and definitions set forth in its First Set of Document Requests to Defendant Eastman Kodak Company (1-70) and its Fourth Set of Document Requests to Defendant Eastman Kodak Company (92-136).

SUBJECT MATTER CATEGORIES

1. The structure and operation of the source code for each Kodak device.
2. The internal operation of each Kodak device from the time a user presses the shutter button until the time a file is stored on an SD/MMC card.
3. The internal operation of each Kodak device from the time a user presses the Review button until the time a picture is displayed on the device's LCD.
4. The internal operation of each Kodak device from the time a user selects the Multi-up menu option in Review mode until the time a Multi-up window is displayed on the device's LCD.
5. The internal operation of each Kodak device from the time a user selects the Magnify option in Review mode one or more times until the time a magnified picture is displayed on the LCD.
6. Each Kodak device's compliance with Exif and DCF standards including, but not limited to, identification of the version of each standard with which each Kodak device complies.
7. The amount, if any, and reasons for any difference in resolution between the CCD, the CFA image, and a "Best" quality body image in each Kodak device.
8. Any and all uses of direct memory access (DMA) in each Kodak device including, but not limited to, the use of DMA for transfers between SDRAM and the DSP subsystem and between SDRAM and an SD/MMC card.
9. The transfer path between SDRAM and an SD/MMC card in each Kodak device including, but not limited to, an identification of any "intervening circuitry" between the SDRAM and an SD/MMC card through which data passes during a data transfer between SDRAM and an SD/MMC card.
10. The situations, if any, in which each Kodak camera does not use a cluster buffer during the transfer of image data from SDRAM to an SD/MMC card including, but not limited to, Kodak's knowledge of how often such situations occur.
11. Identification of all third-party materials available to Kodak developers during the development of each Kodak device including, but not limited to, third-party

software, programmer's guides, and information relating to the development environment of each processor within each Kodak device.

12. The selection and use of particular target JPEG compression ratios and/or target JPEG-compressed file sizes in each Kodak device, including but not limited to Kodak's testing of sample images.
13. The structure and operation of the image processing chain (*see, e.g.*, EKC001021025-31) in each Kodak device including, but not limited to, the operation of A-star functions, bad pixel correction, defect correction, sigma filtering, color correction, edge enhancement, thumbnail generation, JPEG compression, and any other image processing performed by each Kodak device.
14. The operation of the iMX hardware accelerator in each Kodak device including, but not limited to, the functions performed by the iMX during image processing, the operation of the source code files for each Kodak device that issue commands to the iMX including, but not limited to, "ipstilliMX_F.c" and "ipstilliMX_T.c" and the operation of individual command instructions for the iMX (e.g. "IMX_OP1", "IMX_OP2").
15. The storage of the Bayer pattern in SDRAM in each Kodak device.
16. The storage of image information in each Kodak device including, but not limited to, camera settings, capture settings, A-star settings, and any other user-defined settings.
17. The differences, if any, between the most recent and/or most complete version(s) of the Engineering Requirements Specification for each Kodak device and the actual implementation of the corresponding Kodak device.
18. Identification of Kodak camera "Types" (e.g. Type 3a, Type 3b, Type 4, *see* Storer 6/8/2005 Deposition Tr. at 29), as such "Types" are used at Kodak, on what basis are such camera "Types" are defined, the identity of which particular Kodak cameras are designated as certain "Types," and the structural and/or operational differences, if any, between the Kodak cameras within each Type.